



CORPORATION SERVICE COMPANY®

Notice of Service of Process

TV / ALL
Transmittal Number: 4312367
Date Processed: 01/11/2006

Primary Contact: SOP Scan - Monsanto
SOP - PowerBrief - Tallahassee
SOP - Scan
1201 Hays Street
Tallahassee, FL 32301-2607

Entity:	Monsanto Company Entity ID Number 2282193
Entity Served:	Monsanto Company
Title of Action:	Michael Abbatiello vs. Monsanto Company
Document(s) Type:	Amended Complaint
Nature of Action:	Personal Injury
Court:	New York County Supreme Court, New York
Case Number:	116929/05
Jurisdiction Served:	New York
Date Served on CSC:	01/11/2006
Answer or Appearance Due:	none given
Originally Served On:	CSC
How Served:	Personal Service
Plaintiff's Attorney:	Lawrence P. Biondi 914-946-5093

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

To avoid potential delay, please do not send your response to CSC
2711 Centerville Road Wilmington, DE 19808 (888) 690-2882 | sop@cscinfo.com

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
MICHAEL ABBATIELLO and
SEE RIDER ATTACHED

Index No.: 116929/05

Plaintiffs,

- against -

MONSANTO COMPANY, SOLUTIA, INC. and
PHARMACIA CORPORATION,

Defendants..
-----X

AMENDED
VERIFIED COMPLAINT

NEW YORK
COUNTY CLERK'S OFFICE

DEC 20 2005

NOT COMPARED
WITH COPY FILED

Plaintiffs, by their attorneys, LAW OFFICES OF LAWRENCE P. BIONDI,
complaining of the defendants respectfully alleges, upon information and belief:

1. That this is a personal injury case brought by 590 plaintiffs currently employed by the General Electric Company at its Main Plant located in the City of Schenectady, Town of Rotterdam, Schenectady County, State of New York. Each of the plaintiffs has been exposed, and continues to be exposed, to the now outlawed human carcinogen, PCBs, which were designed, manufactured and sold by the defendants.

2. Plaintiff MICHAEL ABBATIELLO resides at 1230 Bradford Street, Schenectady, New York. The names and addresses of the other plaintiffs are listed on Rider.

3. Defendant MONSANTO COMPANY is a corporation organized and existing under the laws of the State of Delaware with its principal place of business in St. Louis, Missouri. Defendant PHARMACIA CORPORATION is a corporation organized

and existing under the laws of the State of Delaware with its principal place of business in New York, New York. SOLUTIA, INC. is a corporation organized and existing under the laws of the State of Delaware with its principal place of business in St. Louis, Missouri. Said corporations are residents of New York County pursuant to CPLR 503(c) and therefore venue in New York County is appropriate. The defendants are collectively referred to herein as "MONSANTO."

4. PCBs are carcinogenic materials which were manufactured by MONSANTO for use as insulation in electrical transformers and other commercial purposes such as pesticides, hydraulic fluid, paint, newsprint and coils in deep fat fryers. PCBs were favored by the electrical industry because they were non-flammable and could conduct heat without conducting electricity.

5. MONSANTO was the sole United States manufacturer of PCBs. All PCBs manufactured by MONSANTO in this country were manufactured at two plants; one located in Anniston, Alabama and the other in Sauget, Illinois.

6. At all times, MONSANTO had superior knowledge concerning PCBs and the manufacture and disposal of PCBs.

7. PCBs are hazardous to humans and the environment. PCBs remain toxic and do not readily breakdown in the environment. As set out in more detail below, numerous tests and empirical evidence show that PCBs cause cancer, liver disease, suppression of the immune system, imbalance of hormonal systems, reduction in IQ, thyroid dysfunction, heart dysfunction, hypertension, diabetes, nervous system disorders, sex hormone imbalances, adverse skin conditions and other maladies in humans.

8. Because of the longevity of PCBs and their hazardous effects on humans and the environment, the United States government officially banned production of PCBs in the 1970s.

9. MONSANTO at all times relevant hereto knew of the hazards of PCBs but, because of the profitability of the enterprise, continued to manufacture PCBs.

10. From the early days of PCBs manufacturing, MONSANTO recognized that PCBs were hazardous materials. As early as the 1930s, MONSANTO was aware that PCBs caused skin and liver disorders. In the 1940s, scientists found that PCBs were linked to serious liver disorders in workers in wire and cable mills where PCBs were handled.

11. In the 1950s, reports showed that prolonged exposure to PCBs caused liver problems. In 1955, MONSANTO recognized: "We know [PCBs] are toxic but the actual limit has not been precisely defined." In fact, MONSANTO specifically prohibited their workers from eating lunches in the manufacturing areas of the chemical plant due to the dangers of PCBs. Thereafter, MONSANTO, the U.S. government and others conducted numerous tests related to PCBs which confirmed the toxicity and the dangers of PCBs.

12. MONSANTO learned in 1968 that 1300 people in Japan had become ill after eating PCBs-contaminated rice oil. They learned in 1970 that cows in Ohio ingesting grain from silos painted with paints containing PCBs produced PCBs-contaminated milk. By the same time, MONSANTO had received reports that PCBs in humans caused cancer, liver damage and problems with the reproductive process.

13. In 1969, MONSANTO concluded that "there is little probability that any

action that can be taken will prevent the growing incrimination of specific [PCBs] as nearly global environmental contaminants leading to contamination of human food (particularly fish), the killing of some marine species (shrimp), and the possible extinction of several species of fish eating birds.”

14. A 1974 report by the National Institute for Occupational Safety & Health sent to MONSANTO wrote that a “tremendous quantity of research has demonstrated that environmental exposure to [PCBs] causes serious impairment of the functions of the liver.”

15. A 1975 report by the United States Environmental Protection Agency sent to MONSANTO confirmed that PCBs “pose a threat to human health and the environment.”

16. MONSANTO knew PCBs were hazardous but manufactured and profited from them for more than 40 years with conscious disregard for the rights of others.

**PLAINTIFFS' EXPOSURE TO PCBs AT
GENERAL ELECTRIC'S MAIN PLANT**

17. The General Electric (GE) Main Plant is located in the City of Schenectady and the Town of Rotterdam, Schenectady County, New York State. The 628-acre site is bordered to the north and east by Interstate 890, by the Delaware and Hudson Railroad to the south, and by Rotterdam Square Mall to the west. There are residential properties approximately 50 to 100 feet above the site on the steep, wooded Bellevue Bluffs south of the railroad.

18. The Mohawk River flows west to east along the north side of Interstate 890. The former Binnie Kill channel, which was connected to the Mohawk River until the mid-1900s, passed through the north central and northeastern portion of the site. Over time, most of the former Binnie Kill Channel was filled with soil and demolition debris. A former holding pond within the northern portion of the site is the only area of free-standing water that remains of the former Binnie Kill Channel. A portion of the Erie Canal once passed through the Main Plant site. This portion of the Erie Canal was elevated above surrounding grade.

19. GE's manufacturing operations are mainly conducted within the central and eastern portions of the site. Two streams, the Poentic Kill and Poenties Kill, two wetland areas, and three former landfill areas are in the western portion of the site. The site is relatively flat except near the former landfill areas.

20. GE's history at the Main Plant began in 1886 when Thomas Edison purchased two vacant factory buildings. Over time, more than 240 structures were erected to meet GE's manufacturing needs. Currently there are approximately 40 buildings at the 628-acre site and the Main Plant continues to produce large steam turbines and generators.

21. Over the years, GE has used the Main Plant to manufacture a variety of products including electric motors and generators, gas turbines, wire and cable, insulating materials and microwave tubes.

22. From the mid-1940s through the early 1980s, GE disposed waste and debris in three areas in the western portion of the site: the former East Landfill Area (60-acres), the former West Landfill Area (54-acres), and the former Binnie Kill Landfill Area (7-acres).

23. Waste disposal occurred in a number of other areas at the site. These include:

- chemical and material storage areas
- buildings and process areas
- lagoons and wastewater discharge areas
- spills
- above-ground and underground storage tanks
- sumps and floor drains
- sewers and piping

24. In 1987, the New York State Department of Environmental Conservation (NYSDEC) listed the site as a Class 2 site in the Registry of Inactive Hazardous Waste Disposal Sites in New York. A Class 2 site is a site where hazardous waste presents a significant threat to the public health or the environment and action is required.

25. In 1995, GE entered into Order on consent #A4-0336-95-09 to complete a site-wide environmental investigation for the Main Plant. Under the Consent Order, the 628-acre site was divided into 20 separate geographic areas or sectors to assist with prioritizing the investigative process. Nineteen (19) sectors (Sectors B through T) were segregated into two large areas known as Zone 1 and Zone 2. One additional sector

(Sector O) straddles the boundary between Zone 1 and Zone 2. The geometry of the two zones is based on the hydrogeologic conditions beneath the Main Plant. Zone 1, which is the middle portion of the site, is above the primary groundwater migration pathway beneath the site. Zone 2 represents the remainder of the site located east of the Zone 1 (Zone 2-East) and west of Zone 1 (Zone 2-West).

26. Numerous site investigations were undertaken to determine the nature and extent of contamination resulting from prior manufacturing and disposal operations at the site. The entire remedial investigation process commenced in 1995 and ended in 2003. Earlier investigations and data gathering also took place between 1990 and 1995.

27. In accordance with the requirements of the site-wide Consent Order, GE completed a Remedial Investigation (RI) and Feasibility Study (FS) for the Main Plant. The purpose of the RI was to collect and evaluate data regarding the nature and extent of contamination at the site. The RI was conducted between July 2000 and January 2003. The *Zone 1 RI Report*, dated April 25, 2000, and the *Revised RI Report*, dated May 30, 2004, describe the field activities and findings of the RI in detail. The RI collected an extensive amount of technical data and historical information. The data generated during these studies attempted to identify the nature and extent of contamination and potential exposure pathways at the site.

28. The following activities were conducted during the RI:

- Reviewed all prior site investigation data and information;
- Collected 182 soil samples from 171 locations;
- Installed 53 new monitoring wells and 54 new piezometers;
- Collected 273 groundwater samples from 174 monitoring wells and piezometers;

- Collected 192 groundwater screening samples from 116 temporary monitoring locations;
- Collected nine non-aqueous phase liquid (NAPL) samples from nine locations;
- Collected two rounds of synoptic water levels and four partial rounds of water level measurements;
- Collected 39 surface water samples from on-site water bodies;
- Collected 164 sediment samples from on-site water bodies;
- Collected 10 biota samples;
- Conducted a long-term pumping test; and
- Conducted 18 slug tests.

29. To determine whether the site media contain contamination at levels of concern, data from the investigation were compared to the following Standards, Criteria & Guidance (SCGs):

- Groundwater, drinking water, and surface water SCGs are based on NYSDEC "Ambient Water Quality Standards and Guidance Values" and Part 5 of the New York State Sanitary Code.
- Soil SCGs are based on the NYSDEC "Technical and Administrative Guidance Memorandum (TAGM) 4046; Determination of Soil Cleanup Objectives and Cleanup Levels".
- Sediment SCGs are based on the NYSDEC "Technical Guidance for Screening Contaminated Sediments."

30. As a result of investigations at the site, seven media-based Areas of Concern (AOCs) were identified. These AOCs are:

- Groundwater
- Surface Water and adjacent wetlands
- Sediments
- Former East Landfill Seeps
- Soils
- Ambient Air (including indoor air)
- Site Habitats

31. The main categories of contaminants that exceed their SCGs are volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs) including polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs) and inorganics (metals).

32. PCBs are a group of 209 different synthetic organic chemicals which were used by industry because of their resistance to heat and degradation, their being good electrical insulators and dielectric fluids, and their having certain other useful properties. PCBs generally have relatively low solubility in water (are "hydrophobic"), relatively low volatility in air, and tend to preferentially associate with oils and fats (are "lipophilic"). PCBs also preferentially associate with organic carbon. In the environment, PCBs are relatively persistent, and are degraded only under certain conditions. PCBs bioaccumulate in animals; for example, PCBs concentrations found in fish are frequently 100,000 or more times higher than levels found in water. PCBs pose a health risk to humans depending on the route and duration of exposure and the dose received. PCBs also pose ecological health risks.

33. PCBs were detected in surface soils at concentrations that exceed the NYSDEC SCG of 1 ppm in the former East and West Landfill Areas, near former Building 259, near former Building 29, near former Building 60, near former Building 109, and in the waste water treatment plant area.

34. PCBs were detected in subsurface soils at concentrations that exceed the NYSDEC SCG of 10 ppm in the former East Landfill Area, near former Building 85, and in the former Binnie Kill Channel.

35. PCBs were detected in shallow groundwater at concentrations that exceed the NYSDEC's groundwater standards near the former East Landfill Area, near Building 49/53, and in the former Binnie Kill Channel. PCBs were also detected in light non-aqueous phase liquids (LNAPL) found in these areas.

36. PCBs were detected in seeps at concentrations that exceed NYSDEC's groundwater standards.

37. There were a total of sixteen sediment samples collected from the Poentic Kill, Poenties Kill, and wetlands in 2000. These samples were analyzed for PCBs. Seven of the sixteen sediment samples contained PCBs. Where detected, the total PCB concentration ranged from 0.127 ppm to 0.783 ppm, which are above the NYSDEC's sediment screening criteria.

38. PCBs were detected in biota samples collected near the seeps at concentrations that exceed NYSDEC's standards. Both vertebrates (fish and frog) and invertebrates (crayfish) were collected and analyzed for PCBs. Where detected, the total concentrations of PCBs in two crayfish samples ranged from 0.2 ppm to 0.209 ppm. The total PCB concentration in a frog sample was 0.26 pm. The total PCBs in fish samples ranged from 0.0529 ppm to 4.92 ppm. The highest PCB concentrations were found in fish collected near seeps 2 through 4.

39. As a result of their continuing exposure to PCBs on or about the General Electric Main Plant, each of the plaintiffs herein has been, and continues to be, exposed to dangerous levels of PCBs and as a direct and proximate result thereof have elevated

levels of PCBs in their blood and body organs causing them severe and permanent personal injuries including cancer, liver disease, suppression of the immune system, imbalance of hormonal systems, reduction in IQ, thyroid dysfunction, heart dysfunction, hypertension, diabetes, nervous system disorders, sex hormone imbalances, adverse skin conditions and other maladies.

40. At all times relevant herein, General Electric purchased PCBs-containing various products from MONSANTO which were used in the manufacture of a variety of products including electric motors and generators, gas turbines, wire and cable, insulating materials and microwave tubes.

41. MONSANTO designed, manufactured and sold all the PCBs-containing products and materials to General Electric which were utilized by General Electric at its Main Plant and which thereupon caused the exposure and injuries to the plaintiffs herein.

AS AND FOR A FIRST CAUSE OF ACTION

42. Plaintiffs repeat, reiterate and reallege each and every allegation contained in paragraphs "1" through "41" inclusive with the same force and effect as if hereinafter set forth at length.

43. Plaintiffs continuously worked with and were exposed to the PCBs-containing products and materials mined, manufactured, processed, imported, converted, compounded, installed, or sold by MONSANTO. During the course of their employment

from on or about the 1970s to date and continuing, plaintiffs were exposed to MONSANTO'S PCBs-containing materials which exposure directly and proximately caused them to develop PCBs-related diseases and injuries.

44. MONSANTO mined, processed, manufactured, designed, fabricated, fashioned, packaged, distributed, sold and/or delivered various PCBs-containing products to which plaintiffs were exposed during the period of time they were employed and continue to be employed at the GE Main Plant.

45. At all times pertinent hereto, MONSANTO acted through its duly authorized agents, servants and employees, who were then and there acting in the course of and scope of their employment and in furtherance of the business of MONSANTO.

46. During the scope and course of their employment from on or about the 1970s to date and continuing, plaintiffs were necessarily and unavoidably exposed to PCBs emanating from the PCBs-containing products of MONSANTO.

47. As a proximate result of the exposure to the PCBs-containing products of MONSANTO, plaintiffs developed PCBs related diseases and injuries.

48. At all relevant times, MONSANTO knew, or should have known, that the PCBs-containing products which they provided were inherently dangerous beyond the expectations of the ordinary user or handler who would come into contact with these products.

49. MONSANTO negligently failed to provide any or adequate and proper warnings as to the dangers of the use of said products and materials to those persons using, handling, or coming into contact therewith.

50. MONSANTO negligently failed to warn and failed to provide adequate instructions of any potentially safer handling methods which should have been utilized by users, handlers, or other persons who were reasonably and foreseeably known to come into contact with the PCBs-containing products and materials.

51. MONSANTO negligently failed to investigate and/or test for the hazards of PCBs products and materials.

52. To the extent that MONSANTO may have inquired as to the hazards of said materials, MONSANTO negligently failed to convey whatever knowledge of dangers, health hazards, or safety precautions they may have had to the users and consumers of their PCBs-containing products.

53. MONSANTO negligently failed to develop, make available and/or provide nonhazardous substitutes which could have been used for the same purpose as their PCBs-containing products and materials.

54. MONSANTO negligently failed to design PCBs-containing products and materials in such a fashion as to prohibit or minimize the release of and exposure to PCBs.

55. As a direct result of working with or near the PCBs-containing materials supplied by MONSANTO and/or working with or near the disposal of the PCBs-containing materials, plaintiffs unavoidably developed elevated levels of PCBs in their blood and body organs, PCBs-related diseases and injuries and are disabled as a result thereof. Plaintiffs have suffered and endured great pain and mental anguish and suffered loss of enjoyment of their lives.

56. The PCBs-related diseases and injuries of the plaintiffs were proximately caused by MONSANTO's negligent actions in that, inter alia, they negligently designed, processed, manufactured, packaged, distributed, delivered and/or installed the PCBs-containing products to which the plaintiffs were exposed, all of which evidenced a callous, reckless, wanton, oppressive, malicious, willful, depraved indifference to the health, safety and welfare of the rights of others and more particularly the rights of the plaintiffs, all of which MONSANTO had due and timely notice.

57. MONSANTO negligently failed to render warnings, advise, give instructions and/or information to plaintiffs so that they could have made an adequate and informed judgment as to the use of said products and were otherwise negligent.

58. MONSANTO since the 1930's has possessed medical and scientific data which clearly indicates that their PCBs-containing products were hazardous to health; and prompted by pecuniary motives, MONSANTO ignored and failed to act upon said medical and scientific data and conspired to deprive the public and particularly the users including plaintiffs of said medical and scientific data and therefore deprived the public at

large and the plaintiffs in particular of the opportunity of free choice as to whether or not to expose themselves to the PCBs-containing products of MONSANTO; and further, willfully, intentionally and wantonly failed to warn plaintiffs of the serious bodily harm which would result from their exposure to the PCBs-containing products.

59. MONSANTO's utter failure to use reasonable care under all the circumstances is the proximate cause of plaintiffs' PCBs-related diseases and injuries.

60. As a result of the foregoing, plaintiffs were seriously and permanently injured.

61. As a result of their continuing exposure to PCBs on or about the General Electric Main Plant, each of the plaintiffs herein has been, and continues to be, exposed to dangerous levels of PCBs and as a direct and proximate result thereof has elevated levels of PCBs in their blood and body organs causing them severe and permanent personal injuries including cancer, liver disease, suppression of the immune system, imbalance of hormonal systems, reduction in IQ, thyroid dysfunction, heart dysfunction, hypertension, diabetes, nervous system disorders, sex hormone imbalances, adverse skin conditions and other maladies.

62. By reason of the foregoing, said plaintiffs have been damaged in the sum of ONE BILLION DOLLARS (\$1,000,000,000.00) in compensatory damages and ONE BILLION DOLLARS (\$1,000,000,000.00) in punitive damages.

AS AND FOR A SECOND CAUSE OF ACTION

63. Plaintiffs repeat, reiterate and reallege each and every allegation contained in paragraphs "1" through "62" inclusive with the same force and effect as if hereinafter set forth at length.

64. MONSANTO expressly and impliedly warranted that said PCBs-containing materials were of good and merchantable quality and fit for their intended use.

65. The implied/express warranties made by MONSANTO that its PCBs-containing materials were of good and merchantable quality and fit for their particular use were breached in that said materials contained harmful, toxic, poisonous and carcinogenic levels of PCBs which caused severe and permanent personal injuries to the plaintiffs while performing their duties in the ordinary course of their employment.

66. As a direct and/or proximate result of the breach of the implied/express warranties of good and merchantable quality and fitness for the particular use, plaintiffs were seriously injured and developed PCBs-related diseases and injuries and were caused to endure great pain and suffering.

67. As a result of their continuing exposure to PCBs on or about the General Electric Main Plant, each of the plaintiffs herein has been, and continues to be, exposed to dangerous levels of PCBs and as a direct and proximate result thereof has elevated levels of PCBs in their blood and body organs causing them severe and permanent personal injuries including cancer, liver disease, suppression of the immune system, imbalance of

hormonal systems, reduction in IQ, thyroid dysfunction, heart dysfunction, hypertension, diabetes, nervous system disorders, sex hormone imbalances, adverse skin conditions and other maladies.

68. By reason of the foregoing, said plaintiffs have been damaged in the sum of ONE BILLION DOLLARS (\$1,000,000,000.00) in compensatory damages and ONE BILLION DOLLARS (\$1,000,000,000.00) in punitive damages.

AS AND FOR A THIRD CAUSE OF ACTION

69. Plaintiffs repeat, reiterate and reallege each and every allegation contained in paragraphs "1" through "68" inclusive with the same force and effect as if hereinafter set forth at length.

70. At all relevant times, MONSANTO, as part of its business, manufactured, designed, supplied, developed, fashioned, packaged, distributed, delivered, installed, sold, and/or otherwise placed PCBs-containing products and materials into the stream of commerce in a defective, unsafe and inherently dangerous condition and the products and materials were expected to and did reach users, handlers and persons coming into contact with the said products and materials without substantial change in the condition in which they were sold.

71. The PCBs-containing products and/or materials sold by MONSANTO did not contain a warning and/or information concerning the dangers to persons using, handling or coming into contact therewith.

72. The PCBs-containing products and/or materials sold by MONSANTO did not contain adequate and/or correct warnings and instructions of safety precautions to be observed by users, handlers, and persons who would reasonably and foreseeably come into contact with said products and/or materials.

73. That at all times herein, the products and/or materials being used herein were being employed for the purposes and in the manner normally intended and the defects of the said products were not discoverable by the plaintiffs by the exercise of reasonable care, nor were the dangers of said products perceivable on the part of the plaintiffs and the plaintiffs would not have otherwise averted their injuries by the exercise of reasonable care.

74. Said PCBs-containing materials were defective and dangerous at the time they were sold as the products and/or materials contained a latent defect and were harmful, poisonous and deleterious when introduced into the environment where the plaintiffs carried on their work duties.

75. MONSANTO, by selling their PCBs-containing materials in a defective and dangerous condition to the users thereof, such as the plaintiffs, is strictly liable to the plaintiffs for any illnesses and injuries from said defective products.

76. As a direct and proximate result of the sale by MONSANTO to plaintiffs' employers, and/or other contractors, of said defective and unreasonably dangerous products and/or materials, the plaintiffs sustained serious and permanent injuries and suffered loss of enjoyment of their lives.

77. As a result of their continuing exposure to PCBs on or about the General Electric Main Plant, each of the plaintiffs herein has been, and continues to be, exposed to dangerous levels of PCBs and as a direct and proximate result thereof has elevated levels of PCBs in their blood and body organs causing them severe and permanent personal injuries including cancer, liver disease, suppression of the immune system, imbalance of hormonal systems, reduction in IQ, thyroid dysfunction, heart dysfunction, hypertension, diabetes, nervous system disorders, sex hormone imbalances, adverse skin conditions and other maladies.

78. By reason of the foregoing, said plaintiffs have been damaged in the sum of ONE BILLION DOLLARS (\$1,000,000,000.00) in compensatory damages and ONE BILLION DOLLARS (\$1,000,000,000.00) in punitive damages.

AS AND FOR A FOURTH CAUSE OF ACTION

79. Plaintiffs repeat, reiterate and reallege each and every allegation contained in paragraphs "1" through "78" inclusive with the same force and effect as if hereinafter set forth at length.

80. At all times relevant hereto, MONSANTO knew that PCBs were hazardous materials and that exposure thereto caused severe and permanent illnesses and injuries.

81. With full knowledge of the hazards of PCBs, MONSANTO made the conscious decision to suppress and conceal these facts from the public and plaintiffs in order to maintain sales and to avoid liability, publicity, and other adverse consequences of their actions. Most egregiously, instead of attempting to warn the public and to clean up the environment, MONSANTO set out to sell even more PCBs. At all times, MONSANTO had knowledge superior to that of the state and the public concerning the true hazards of PCBs.

82. In 1969, MONSANTO appointed an “ad hoc” committee on PCBs to address the “situation concerning environmental contamination through the manufacture and use of [PCBs].”

83. The purpose of the committee was to implement a plan to conceal material information from the public while at all times seeking to increase profits from the sales of PCBs. The stated objectives of the committee were to “Protect continued sales and profits of [PCBs]” and “Protect the image” of MONSANTO in order to “Permit continued development of new uses and sales” of PCBs.

84. A memo setting out these objectives candidly acknowledged that “there is little probability that any action that can be taken will prevent the growing incrimination of specific [PCBs] as nearly global environmental contaminants leading to contamination

of human food (particularly fish), the killing of some marine species (shrimp), and the possible extinction of several species of fish eating birds.” In the face of these admitted environmental hazards, the committee suggested “a number of actions which must be undertaken to prolong the manufacture, sale and use of these particular [PCBs] as well as to protect the continued use of other members of the [PCB] series.” MONSANTO was very concerned about its profits: “There can not be too much emphasis given to the threat of curtailment or outright discontinuance of the manufacture and sales of this very profitable series of compounds.”

85. MONSANTO established early on a company policy to: “Give no statements or publications which would bring the [PCB] situation to the public’s attention.”

86. As part of its scheme to conceal, MONSANTO set out to “cooperate” with government authorities in confidential discussions that were not disclosed to the public or to plaintiffs. MONSANTO touted its efforts to decrease the release of PCBs into the environment while failing to do anything about the pollution that had already occurred as a result of years of improper disposal. MONSANTO failed to fully disclose to governmental authorities the extent of the pollution and the long term adverse effects of PCBs already discharged into the environment.

87. In like manner, MONSANTO failed to inform certain corporate customers, including General Electric, of potential problems with PCBs and also failed to disclose the long term effects on the health and well-being of GE workers exposed to PCBs.

88. MONSANTO made no effort to disclose to the public, including plaintiffs, the dangers of PCBs and the fact that the General Electric Main Plant had been contaminated with PCBs which will exist for years in the soil, sediment and water.

89. In 1975, a supposedly independent laboratory hired by MONSANTO to study the effects of PCBs issued a report on cancer caused by PCBs in laboratory rats. The "independent" lab concluded in its report that PCBs were "slightly tumorigenic." To conceal this information, MONSANTO requested the lab to change and falsify the report by changing the description of PCBs from "slightly tumorigenic" to "does not appear to be carcinogenic" in order to avoid adverse publicity.

90. MONSANTO's plan succeeded, and through the early 1970's it continued to profit from the sales of PCBs while at all times failing to warn of the pollution at the General Electric Main Plant and surrounding areas. Only the threat of a national ban on production and the pressure of the United States government stopped MONSANTO from continuing to manufacture PCBs. The ban on production, however, was too late because the damage to the General Electric Main Plant had already been done. Moreover, PCBs still presently continue to be discharged into the environment at the General Electric Main Plant thus exacerbating the contamination problem and injuries to the plaintiffs herein.

91. The aforementioned conduct and misrepresentations made by MONSANTO was intentionally designed to foster the continued sale of its PCBs-containing materials and products and to prevent the general public, buyers of its products, including the

General Electric Company, and the plaintiffs herein from knowing and fully appreciating the dangers and serious health consequences of exposure to these materials.

92. The general public, General Electric Company and the plaintiffs herein relied on the aforementioned conduct, misrepresentations and concealment of MONSANTO to their detriment by continuing to buy and use said products and materials and by improperly disposing of said products and materials after their use thereof.

93. As a direct and proximate result of the conduct, misrepresentations and concealment of MONSANTO, the plaintiffs herein were unreasonably exposed to the dangers of PCBs and sustained severe and personal injuries as a result thereof.

94. As a result of their continuing exposure to PCBs on or about the General Electric Main Plant, each of the plaintiffs herein has been, and continues to be, exposed to dangerous levels of PCBs and as a direct and proximate result thereof has elevated levels of PCBs in their blood and body organs causing them severe and permanent personal injuries including cancer, liver disease, suppression of the immune system, imbalance of hormonal systems, reduction in IQ, thyroid dysfunction, heart dysfunction, hypertension, diabetes, nervous system disorders, sex hormone imbalances, adverse skin conditions and other maladies.

95. By reason of the foregoing, said plaintiffs have been damaged in the sum of ONE BILLION DOLLARS (\$1,000,000,000.00) in compensatory damages and ONE BILLION DOLLARS (\$1,000,000,000.00) in punitive damages.

AS AND FOR A FIFTH CAUSE OF ACTION

96. Plaintiffs repeat, reiterate and reallege each and every allegation contained in paragraphs "1" through "95" inclusive with the same force and effect as if hereinafter set forth at length.

97. At all times relevant herein, MONSANTO negligently inflicted emotional distress on each plaintiff by its manufacture, creation, production and use of PCBs and by its failure to advise the general public, General Electric Company and the plaintiffs of the serious damages associated with exposure to PCBs as alleged above.

98. As a result of said conduct by MONSANTO, plaintiffs have sustained extreme emotional distress and mental anguish associated with their physical injuries as well as extreme emotional distress and mental anguish associated with the failure of MONSANTO to advise them of the serious health effects associated with exposure to PCBs.

99. As a result of their continuing exposure to PCBs on or about the General Electric Main Plant, each of the plaintiffs herein has been, and continues to be, exposed to dangerous levels of PCBs and as a direct and proximate result thereof has elevated levels of PCBs in their blood and body organs causing them severe and permanent personal injuries as well as extreme emotional distress and mental anguish.

100. By reason of the foregoing, said plaintiffs have been damaged in the sum of ONE BILLION DOLLARS (\$1,000,000,000.00) in compensatory damages and ONE BILLION DOLLARS (\$1,000,000,000.00) in punitive damages.

AS AND FOR A SIXTH CAUSE OF ACTION

101. Plaintiffs repeat, reiterate and reallege each and every allegation contained in paragraphs “1” through “100” inclusive with the same force and effect as if hereinafter set forth at length.

102. At all times relevant herein, MONSANTO intentionally inflicted emotional distress on each plaintiff by knowing and willfully manufacturing, creating, producing and using PCBs and by its failure to advise the general public, General Electric Company and the plaintiffs of the serious damages associated with exposure to PCBs as alleged above.

103. As a result of said conduct by MONSANTO, plaintiffs have sustained extreme emotional distress and mental anguish associated with their physical injuries as well as extreme emotional distress and mental anguish associated with the failure of MONSANTO to advise them of the serious health effects associated with exposure to PCBs.

104. As a result of their continuing exposure to PCBs on or about the General Electric Main Plant, each of the plaintiffs herein has been, and continues to be, exposed to dangerous levels of PCBs and as a direct and proximate result thereof has elevated levels of PCBs in their blood and body organs causing them severe and permanent personal injuries as well as extreme emotional distress and mental anguish.

105. By reason of the foregoing, said plaintiffs have been damaged in the sum of ONE BILLION DOLLARS (\$1,000,000,000.00) in compensatory damages and ONE BILLION DOLLARS (\$1,000,000,000.00) in punitive damages.

AS AND FOR A SEVENTH CAUSE OF ACTION

106. Plaintiffs repeat, reiterate and reallege each and every allegation contained in paragraphs "1" through "105" inclusive with the same force and effect as if hereinafter set forth at length.

107. MONSANTO has intentionally and continuously committed battery to each plaintiffs' person by releasing and dispersing toxic substances and pollutants into the plaintiffs' work environment and by allowing those substances to remain in the environment to date and continuing. MONSANTO's battery is a direct and proximate cause of injuries and damages to the plaintiffs.

108. As a result of their continuing exposure to PCBs on or about the General Electric Main Plant, each of the plaintiffs herein has been, and continues to be, exposed to dangerous levels of PCBs and as a direct and proximate result thereof has elevated levels of PCBs in their blood and body organs causing them severe and permanent personal injuries including cancer, liver disease, suppression of the immune system, imbalance of hormonal systems, reduction in IQ, thyroid dysfunction, heart dysfunction, hypertension, diabetes, nervous system disorders, sex hormone imbalances, adverse skin conditions and other maladies.

109. By reason of the foregoing, said plaintiffs have been damaged in the sum of ONE BILLION DOLLARS (\$1,000,000,000.00) in compensatory damages and ONE BILLION DOLLARS (\$1,000,000,000.00) in punitive damages.

AS AND FOR AN EIGHTH CAUSE OF ACTION

110. Plaintiffs repeat, reiterate and reallege each and every allegation contained in paragraphs "1" through "109" inclusive with the same force and effect as if hereinafter set forth at length.

111. MONSANTO has intentionally and continuously committed assault to each plaintiffs' person by releasing and dispersing toxic substances and pollutants into the plaintiffs' work environment and by allowing those substances to remain in the

environment to date and continuing. MONSANTO's assault is a direct and proximate cause of injuries and damages to the plaintiffs.

112. As a result of their continuing exposure to PCBs on or about the General Electric Main Plant, each of the plaintiffs herein has been, and continues to be, exposed to dangerous levels of PCBs and as a direct and proximate result thereof have elevated levels of PCBs in their blood and body organs causing them severe and permanent personal injuries including cancer, liver disease, suppression of the immune system, imbalance of hormonal systems, reduction in IQ, thyroid dysfunction, heart dysfunction, hypertension, diabetes, nervous system disorders, sex hormone imbalances, adverse skin conditions and other maladies.

113. By reason of the foregoing, said plaintiffs have been damaged in the sum of ONE BILLION DOLLARS (\$1,000,000,000.00) in compensatory damages and ONE BILLION DOLLARS (\$1,000,000,000.00) in punitive damages.

AS AND FOR A NINTH CAUSE OF ACTION

114. Plaintiffs repeat, reiterate and reallege each and every allegation contained in paragraphs "1" through "113" inclusive with the same force and effect as if hereinafter set forth at length.

115. By manufacturing, producing, creating, using, releasing and dispersing toxic substances and pollutants into plaintiffs' work environment and by allowing those pollutants to remain in the environment to date and continuing, MONSANTO has engaged in abnormally dangerous, ultra hazardous and inherently or intrinsically dangerous activities for which it is strictly liable to the plaintiffs. Said conduct is a direct and proximate cause of injuries and damages to the plaintiffs.

116. As a result of their continuing exposure to PCBs on or about the General Electric Main Plant, each of the plaintiffs herein has been, and continues to be, exposed to dangerous levels of PCBs and as a direct and proximate result thereof has elevated levels of PCBs in their blood and body organs causing them severe and permanent personal injuries including cancer, liver disease, suppression of the immune system, imbalance of hormonal systems, reduction in IQ, thyroid dysfunction, heart dysfunction, hypertension, diabetes, nervous system disorders, sex hormone imbalances, adverse skin conditions and other maladies.

117. By reason of the foregoing, said plaintiffs have been damaged in the sum of ONE BILLION DOLLARS (\$1,000,000,000.00) in compensatory damages and ONE BILLION DOLLARS (\$1,000,000,000.00) in punitive damages.

AS AND FOR A TENTH CAUSE OF ACTION

118. Plaintiffs repeat, reiterate and reallege each and every allegation contained in paragraphs "1" through "117" inclusive with the same force and effect as if hereinafter set forth at length.

119. As a result of the conduct alleged herein, plaintiffs have sustained personal injuries which are presently known and which presently cause symptoms and pain and suffering. As a direct and proximate result thereof, plaintiffs have incurred and continue to incur the cost of medical treatment and monitoring.

120. Also as a result of the conduct alleged herein, plaintiffs will suffer future injuries, symptoms and pain and suffering from the latent effects of their exposure to PCBs as well as the effects of future and continuing exposure to PCBs at the still contaminated General Electric Main Plant. As a direct and proximate result thereof, plaintiffs will need continual medical treatment, testing and monitoring in the future.

121. As a result of the foregoing, plaintiffs are entitled to recover the costs of past and future medical monitoring, testing and treatment as a separate claim for relief or, alternatively, as additional damages under each of the other claims for relief above.

122. By reason of the foregoing, said plaintiffs have been damaged in the sum of ONE BILLION DOLLARS (\$1,000,000,000.00) in compensatory damages and ONE BILLION DOLLARS (\$1,000,000,000.00) in punitive damages.

AS AND FOR AN ELEVENTH CAUSE OF ACTION

123. Plaintiffs repeat, reiterate and reallege each and every allegation contained in paragraphs "1" through "122" inclusive with the same force and effect as if hereinafter set forth at length.

124. As a direct and proximate result of the conduct alleged herein, plaintiffs have reasonably developed the fear of sustaining severe and permanent personal injuries in the future due to the latent effects of their exposure to PCBs as well as the effects of future and continuing exposure to PCBs at the still contaminated General Electric Main Plant.

125. As a result of the foregoing, plaintiffs are entitled to damages for the extreme emotional distress and mental anguish associated with the reasonable fear of sustaining PCBs-related injuries and illnesses in the future.

126. By reason of the foregoing, said plaintiffs have been damaged in the sum of ONE BILLION DOLLARS (\$1,000,000,000.00) in compensatory damages and ONE BILLION DOLLARS (\$1,000,000,000.00) in punitive damages.

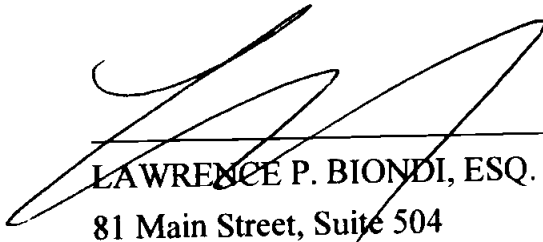
WHEREFORE, plaintiffs demand judgment against MONSANTO on the First Cause of Action in the amount of ONE BILLION DOLLARS (\$1,000,000,000.00) for compensatory damages and ONE BILLION DOLLARS (\$1,000,000,000.00) for punitive damages; on the Second Cause of Action in the amount of ONE BILLION DOLLARS

(\$1,000,000,000.00) for compensatory damages and ONE BILLION DOLLARS (\$1,000,000,000.00) for punitive damages; on the Third Cause of Action in the amount of ONE BILLION DOLLARS (\$1,000,000,000.00) for compensatory damages and ONE BILLION DOLLARS (\$1,000,000,000.00) for punitive damages; on the Fourth Cause of Action in the amount of ONE BILLION DOLLARS (\$1,000,000,000.00) for compensatory damages and ONE BILLION DOLLARS (\$1,000,000,000.00) for punitive damages; on the Fifth Cause of Action in the amount of ONE BILLION DOLLARS (\$1,000,000,000.00) for compensatory damages and ONE BILLION DOLLARS (\$1,000,000,000.00) for punitive damages; on the Sixth Cause of Action in the amount of ONE BILLION DOLLARS (\$1,000,000,000.00) for compensatory damages and ONE BILLION DOLLARS (\$1,000,000,000.00) for punitive damages; on the Seventh Cause of Action in the amount of ONE BILLION DOLLARS (\$1,000,000,000.00) for compensatory damages and ONE BILLION DOLLARS (\$1,000,000,000.00) for punitive damages; on the Eighth Cause of Action in the amount of ONE BILLION DOLLARS (\$1,000,000,000.00) for compensatory damages and ONE BILLION DOLLARS (\$1,000,000,000.00) for punitive damages; on the Ninth Cause of Action in the amount of ONE BILLION DOLLARS (\$1,000,000,000.00) for compensatory damages and ONE BILLION DOLLARS (\$1,000,000,000.00) for punitive damages; on the Tenth Cause of Action in the amount of ONE BILLION DOLLARS (\$1,000,000,000.00) for compensatory damages and ONE BILLION DOLLARS (\$1,000,000,000.00) for punitive damages; and on the Eleventh Cause of Action in the amount of ONE BILLION DOLLARS (\$1,000,000,000.00) for compensatory damages and ONE BILLION

DOLLARS (\$1,000,000,000.00) for punitive damages, together with the reasonable costs and disbursements of this action, including attorneys fees and interest.

Dated: White Plains, New York
November 18, 2005

LAW OFFICES OF LAWRENCE P. BIONDI
Attorneys for Plaintiffs



LAWRENCE P. BIONDI, ESQ.
81 Main Street, Suite 504
White Plains, New York 10601
(914) 946-5093

TO: MONSANTO COMPANY
c/o Corporation Service Company
80 State Street
Albany, New York 12207-2543

SOLUTIA, INC.
c/o Corporation Service Company
80 State Street
Albany, New York 12207-2543

PHARMACIA CORPORATION
c/o CT Corporation System
111 Eighth Avenue
New York, New York 10011

R I D E R

FIRST NAME	LAST NAME	ADDRESS	CITY	STATE	ZIP CODE
Michael	Abbatiello	1230 Bradford Street	Schenectady	NY	12305
Richard	Acerra	445 Johnsonville Road	Johnsonville	NY	12094
Glenn	Achzet	2 Cutter Drive	Johnstown	NY	12095
Carol	Adams	1805 Avenue A	Schenectady	NY	12308
Glenn	Adams	1141 Fayette Drive	Schenectady	NY	12303
Robert	Agans, Sr.	P.O. Box 431, 35 Race Street	Schenevus	NY	12155
Keith	Agneta	217 County Line Road	Schenectady	NY	12306
Scott	Alfieri	7239 Belleview Drive	Schenectady	NY	12303
Alfred	Alois	237 9th Street	Schenectady	NY	12306
Randy	Althiser	941 Charlotte Valley Road	E. Worcester	NY	12064
Edward	Altrock	33 Dunsbach Road	Clifton Park	NY	12065
Michael	Alverson	472 Stage Road	Charlton	NY	12019
Thomas	Amell	176 Touareuna Road	Scotia	NY	12302
Bruce	Anderson	3157 Lone Pine Road	Schenectady	NY	12303
James	Anderson	886 State Route 146	Delanson	NY	12053
Richard	Androkavitz	341 Masullo Parkway	Schenectady	NY	12306
Chester	Andryszczyk	320 6th Street, Apt.2110	Schenectady	NY	12306
Joseph	Angello	1529 Unadilla Street	Schenectady	NY	12308
Robert	Antonini	1607 Van Vranken Avenue	Schenectady	NY	12308
Paul	Armata	P.O. Box 484	North Adams	MA	01247
John	Armstrong	9 North Street	Saratoga	NY	12866
Wayne	Armstrong	2046 Cedarlawn Avenue	Schenectady	NY	12306
Thomas	Askew	412 Mohwak Avenue	Scotia	NY	12302
Karl	Asmus	534 Reita Street	Ballston Spa	NY	12020
Michael	Ausfeldt	13 Lexington Drive	Cifton Park	NY	12065
Bruce	Auspelmyer	166 Wolf Hollow Road	Scotia	NY	12302
Richard	Babravich	370 Lakeview Road	Broadalbin	NY	12025
Christopher	Baldwin	40 Fox Street	Gloversville	NY	12078
Richard	Baluch	127 Gamsey Road	Delanson	NY	12053
George	Baranauskas	411 Reynolds Street	Scotia	NY	12302
Scott	Bartholomew	140 Klimas Road	Gloversville	NY	12078
David	Bartlett	225 Drager Road	Galway	NY	12074
Brian	Barto	14 East Shore Drive	Petersburg	NY	12138
Jonathan	Barton	1674 South Shore Road	Hadley	NY	12835
Robert	Bassett, Sr.	4 Prospect Street	Fort Johnson	NY	12070
Joseph	Battaglino	1242 Evergreen Avenue	Schenectady	NY	12306
Eric	Baumes, Jr.	1923 Jerome Avenue	Schenectady	NY	12306
Donald	Beigler	2146 Route 9	Round Lake	NY	12151
David	Belanger	24 Orchard Street	Cohoes	NY	12047
Brian	Belknap	12 Nelson Street	Gloversville	NY	12078
Joseph	Bellomo	3014 Wilson Avenue	Schenectady	NY	12306
Louis	Benaquisto	1626 Lenox Road	Schenectady	NY	12308
John	Benequisto	10 Clement Avenue	Saratoga Springs	NY	12866
Carl	Beninati	3100 Hayner Heights	Clifton Park	NY	12065
Judith	Bennett	12 Old State Road	Lanesboro	MA	01237
Richard	Berhaupt	3255 Birchton Road	Ballston Spa	NY	12020
Donald	Bernaski	113 Burber Road	Amsterdam	NY	12010
Edward	Berry	131 West Church Street	Fort Hunter	NY	12069
Wayne	Bever	104 Clamsteam Road	Clifton Park	NY	12065

Roy	Biechy	119 Thumb Road	St. Johnsville	NY	13452
Edward	Bienduga	623 Alexander Drive	Rotterdam Junction	NY	12150
Richard	Billa	108 East Clinton Street	Johnstown	NY	12095
Leonard	Billings	119 Clayton Road	Schenectady	NY	12304
Albert	Bitensky	525 Sir Benjamin Way	Schenectady	NY	12304
James	Bixby, Jr.	137 Bixby Road	Schoharie	NY	12157
Barbara	Black	1 Charles Street	Ballston Lake	NY	12019
William	Blair	300 Florida Road	Pattersonville	NY	12137
William	Blanchard	566 State Highway 162	Sprakers	NY	12166
Gordon	Blowers	12 Carolyn Lane	Scotia	NY	12302
Paul	Bode	562 Ontario Street	Schenectady	NY	12306
Gary	Bogusz	819 Ridge Road	Broadalbin	NY	12025
Helen	Bohm	146 Frisbieville Road	Schoharie	NY	12157
Michael	Bolton	2229 Helderberg Avenue	Schenectady	NY	12306
Robert	Bonanno	10 Arnold Avenue	Amsterdam	NY	12010
Anthony	Bonificio	23 Stella Terrace	Albany	NY	12205
Kevin	Boothe	3210 Albany Street	Schenectady	NY	12304
James	Borowski	16 Orchard Street	Canajoharie	NY	13317
Russell	Borthwick	196 Shad Point Road	Cobleskill	NY	12043
Kenneth	Bouek	646 Duanesbury Road	Rotterdam	NY	12306
John	Bowdish	423 Esperance Road	Esperance	NY	12066
Anthony	Bower	7 Yandell Yard	Gansevoort	NY	12831
William	Brasie	1 Hawthorne Court	Loudonville	NY	12211
Stephen	Brassard	1205 Paul Avenue	Schenectady	NY	12306
Larry	Braun	233 14th Street	Schenectady	NY	12306
James	Brennan	3497 Galway Road	Balston Spa	NY	12020
Marcel	Brisson	14 Hembold Drive	Schenectady	NY	12303
James	Broderick	413 Saratoga Road	Scotia	NY	12302
William	Broomhall, Jr.	1934 Fiero Avenue	Schenectady	NY	12303
Ronald	Browder	825 Hamilton Street	Schenectady	NY	12307
Donald	Brown	311 Princetown Road	Schenectady	NY	12306
Lee	Brown	33 Old Fort Avenue	Rotterdam	NY	12306
Michael	Brown	3 Murray Avenue	Waterford	NY	12188
Lou	Buchalski	4 Crestmont Drive	Clifton Park	NY	12065
Garry	Buchner	201 E. Decker Street	Johnstown	NY	12095
Richard	Bullard	19 Skaarland Drive	Burnt Hills	NY	12027
Stephen	Bullis	10 Sage Road	Waterford	NY	12188
Kenneth	Burditt	3009 Kirvin Lane	Schenectady	NY	12306
James	Burgess	123 Cheney Street	Syracuse	NY	13207
Frederick	Burridge	119 N. Holmes Street	Scotia	NY	12302
Darren	Bunyan	900 Rock City Road, Lot 294	Ballston Spa	NY	12020
Harry	Bush	2114 Elton Avenue	Schenectady	NY	12309
Robert	Bush	132 Lorraine Boulevard	Amsterdam	NY	12010
Daniel	Bushey, Sr.	95 Consaul Road	Albany	NY	12205
Robert	Bushnell	9 Orchard Drive	Scotia	NY	12302
Karl	Butler	3267 Western Turnpike	Duanesburg	NY	12056
Donald	Cadoret	3372 Ralph Street	Schenectady	NY	12304
Joseph	Calabello	29 Fort Johnson Avenue	Fort Johnson	NY	12070
John	Callan	1452 Gamer Avenue	Schenectady	NY	12309
Joseph	Campana, Sr.	203 Meadow Street	Johnstown	NY	12095

JoAnn	Campbell	383 W. Glenville Road	Scotia	NY	12302
Randall	Cannell	1332 Wagners Hollow Road	St. Johnsville	NY	13452
Randall	Cannell, II	57 Maple Street	Broadalbin	NY	12025
William	Capron, Jr.	2 Bigwood Road	Scotia	NY	12302
Niek	Captein	101 Route 423	Mechanicville	NY	12118
Richard	Carson	128 Country Walk Road	Schenectady	NY	12306
Donald	Cartwright	95 Glenridge Road	Scotia	NY	12302
Dewey	Carver	150 Warrior Way	Middleburgh	NY	12122
John	Castiglia	131 East Holm Road	Schenectady	NY	12304
James	Catucci	303 Bleecker Street	Gloversville	NY	12078
Stephen	Cernak	157 County Highway 109	Broadalbin	NY	12025
Anthony	Cerra	20 Hialeah Drive	Albany	NY	12205
Louis	Ceruchi	1510 Roselawn Avenue	Schenectady	NY	12306
Joseph	Cetnar	135 Poplar Drive	Amsterdam	NY	12010
John	Chaires, Sr.	1719 Avenue B	Schenectady	NY	12308
Herbert	Chapman, III	6 Elizabeth Street	Rensselaer	NY	12144
Leonard	Charletta	696 Clauverwie Road	Middleburgh	NY	12122
Michael	Chase	535 Sacandaga Road	Scotia	NY	12302
Kenneth	Christopher	15 West Drive	Ballston Lake	NY	12019
James	Cimino	660 Sunset Street	Schenectady	NY	12303
Ralph	Cirincione	16 Concord Street	Scotia	NY	12302
Douglas	Clark	337 Quackenbush Road	Schenectady	NY	12306
Mark	Clemente	157 East Boulevard	Gloversville	NY	12078
Robert	Clink	356 Ballston Road	Scotia	NY	12302
Richard	Clough	2 Hawk Street	Schenectady	NY	12307
Joseph	Colla	18 Woodridge Circle	Clifton Park	NY	12065
Guy	Connelly	6 Noord Lane	Ballston Lake	NY	12019
Richard	Conti	P.O. Box 455, 26 Lansing Street	Hagaman	NY	12086
Tommy	Cook	235 Frisbieville Road	Schoharie	NY	12157
Robert	Cooke	170 Marx Street	Schenectady	NY	12304
David	Cooley	250 Bradley Boulevard	Schenectady	NY	12304
Gerald	Coombs	566 Saddlemire Hill Road	Sloansville	NY	12160
Harry	Cooper	2013 Rosedale Way	Schenectady	NY	12303
Daniel	Corlew	1503 Saratoga Road	Ballston Spa	NY	12020
James	Costanzo	2169 Lynn Street	Schenectady	NY	12306
Harold	Cote	133 Saratoga Road, Apt. H-3	Schenectady	NY	12302
Paul	Cotugno	746 Cramer Avenue	Schenectady	NY	12306
Kasey	Cram	19 Grey Birch Trail	Ballston Spa	NY	12020
Charles	Crankshaw	290 Reidel Road	Amsterdam	NY	12010
Allen	Cromer	574 Sacandaga Road	Scotia	NY	12302
Earl	Cross, Jr.	874 Benedict Street	Niskayuna	NY	12309
Edward	Cross, Jr.	515 Route 32 South	Schuylerville	NY	12871
Daniel	Cullen	139 Mannys Corners Road	Amsterdam	NY	12010
Daniel	Cuomo	306 Mariaville Road	Schenectady	NY	12306
Patricia	Cuomo	306 Mariaville Road	Schenectady	NY	12306
John	Curley	1 Mountainview Drive	Adams	MA	01220
Joseph	Cydylo	431 4th Street	Schenectady	NY	12306
Dennis	Dabiere	28 Stella Lane	Amsterdam	NY	12010
Lorno	D'Ambrosio	147 Cranes Hollow Road	Amsterdam	NY	12010
Mark	Damin	472 Switzer Hill Road	Johnstown	NY	12095

William	Danford	311 Hampton Place Boulevard	Troy	NY	12180
Steven	Daum	P.O. Box 737	Mayfield	NY	12117
Ernest	Daviero, Jr.	1711 State Highway Route 5 South	Amsterdam	NY	12010
Joseph	DeGasperi	1014 Angelina Road	Schenectady	NY	12308
Robert	DeGasperi	2614 Turner Avenue	Schenectady	NY	12306
Michael	Deltry	5 Edmel Road	Glenville	NY	12302
Robert	DeMartino	140 Raylinski Road	Ballston Lake	NY	12019
Joseph	Demers	66 Riverview Road	Clifton Park	NY	12065
Robert	Demers	130 Guideboard Road	Waterford	NY	12188
Russell	Deorazio	2000 Amsterdam Avenue	Schenectady	NY	12303
Carmen	DePoalo	607 Waite Road	Clifton Park	NY	12065
Robert	Des Chenes	4138 Rynex Corners Road	Pattersonville	NY	12137
Henry	Deyoe	1089 Howard Street	Schenectady	NY	12303
Charles	Diamond	197 Spring Road	Delanson	NY	12053
George	Diamond, Sr.	1534 Braman Corners Road	Esperance	NY	12066
Kenneth	Diamond, Jr.	367 Schoharie Hill Road	Schoharie	NY	12157
Ronald	DiCaprio	2 Ormond Avenue	Fort Johnson	NY	12070
Anthony	DiCarlo	925 Ridge Road	Scotia	NY	12302
Maurizio	DiCarlo	1625 Richard Street	Schenectady	NY	12303
Joseph	DiCesare	348 Masullo Parkway	Schenectady	NY	12306
Thomas	Dicocco	1159 Helderberg Avenue	Schenectady	NY	12306
Mark	DiDonato	286 Humphrey Road	Duanesburg	NY	12056
Michael	Donato	5 Cimino Lane, Apt. 7	Schenectady	NY	12306
William	Dougherty	27 Boylston Street	Pittsfield	MA	O1201
Steven	Downey	3 Michael Drive	Saratoga Springs	NY	12866
Francis	Duezek, Jr.	446 Donald Drive	Schenectady	NY	12306
Michael	Duffney	1406 Chestnut Street	Watervliet	NY	12189
Alfred	Dundon, III	P.O. Box 1229	Clifton Park	NY	12065
Harry	Durand, Jr.	27 Redwood Drive	Charlton	NY	12019
Thomas	Durkin	16 Gail Avenue	Albany	NY	12205
William	Dussault	1070 Manas Drive	Schenectady	NY	12303
Donnie	Earl	643 Skyline Drive	Schenectady	NY	12306
Robert	Eggelston	761 Main Street	Corinth	NY	12822
Thomas	Eldred	1686 State Highway Route 162	Sprakers	NY	12166
Donald	Ellis	1915 Huntersland Road	Middleburgh	NY	12122
Clyde	Ernst	364 County Highway 131	Johnstown	NY	12095
Robert	Evans	1056 Willet Street	Schenectady	NY	12304
John	Fair	P.O. Box 51	Sloansville	NY	12160
Miguel	Fallas	10 Mathias Avenue	Amsterdam	NY	12010
Frank	Farina	2885 State Highway 55	Fultonville	NY	12072
Michael	Fealey	394 Gordon Road	Sloansville	NY	12160
Jose	Fernandez	214 Linden Street	Schenectady	NY	12304
Donato	Ferraro	35 Monroe Street	St. Johnsville	NY	13452
Raymond	Fetter	751 Curry Road	Schenectady	NY	12306
Roy	Fetter	329 Spring Road	Delanson	NY	12053
William	Film	129 Ridge Lane	Esperance	NY	12066
Ronald	Fiorillo	427 Vrooman Avenue	Amsterdam	NY	12010
Russell	Fiorillo	410 Vley Road	Scotia	NY	12302
William	Fiorini	1105 Regal Court	Scotia	NY	12302
Thomas	Fitzgerald	195 Reidel Road	Amsterdam	NY	12010

William	Foster, Sr.	815 Middle Street	Niskayuna	NY	12309
Walter	Fountain	756 Central Parkway	Schenectady	NY	12309
Charles	Fowler	241 Humphrey Road	Duanesburg	NY	12056
Thomas	Fraumane	503 Ridge Road	Broadalbin	NY	12025
Albert	Freiermuht	174 Saddlemire Hill Road	Sloansville	NY	12160
Dominick	Friello	2059 Mudge Road	Delanson	NY	12053
Jack	Fronk	3 Wedgewood Court	Ballston Lake	NY	12019
Charles	Frye	1114 Fort Hunter Road	Schenectady	NY	12303
Robert	Furman	P.O. Box 304, 425 Mohawk Drive	Tribes Hill	NY	12177
Thomas	Gallagher, Jr.	841 Sacandaga Road	Schenectady	NY	12302
Patricia	Galvin	1030 Rose Avenue	Schenectady	NY	12303
Michael	Gathen	141 Rose Street	Delanson	NY	12053
Joseph	Gavel	2 Thomas Street	Amsterdam	NY	12010
Kurt	Gendron	139 Blanchard Road	Gloversville	NY	12078
Paul	George	1708 Lenox Road	Schenectady	NY	12308
Lester	Germain	117 Fremont Street	Gloversville	NY	12078
Benjamin	Gholson	1821 Van Cortland Street	Schenectady	NY	12303
Joe	Giaminelli	1923 Leo Avenue	Schenectady	NY	12306
Paul	Giemza	1123 Garner Avenue	Schenectady	NY	12309
William	Gilman	283 Quackenbush Road	Schenectady	NY	12306
Ronald	Girard	18 Monroe Street	Schenectady	NY	12305
Nicholas	Giulianelli	40 Pawling Avenue	Mechanicville	NY	12118
Patrick	Gleason	2253 West Glenville Road	Amsterdam	NY	12010
Andrew	Gnoinski, Jr.	1145 Van Cortland Street	Schenectady	NY	12303
William	Goellner	400 Barton Hill Road	Schoharie	NY	12157
Nancy	Gomula	73 Greenwood Avenue	Amsterdam	NY	12010
Larry	Gooderberlet	36 Jewett Street	Amsterdam	NY	12010
Roger	Goodermote	880 West Shaft Road	North Adams	MA	O1247
John	Gordon	42 Sitterly Road	Clifton Park	NY	12065
Luis	Gracesqui	P.O. Box 1855	Schenectady	NY	12301
Douglas	Graham	1001 Romano Drive	Schenectady	NY	12303
John	Greaves	289 Whiteview Road	Wynantskill	NY	12198
Kenneth	Greene	3409 Consaul Road	Schenectady	NY	12304
Richard	Greenwood	5308 Bliss Road	Ballston Spa	NY	12020
Steven	Grigerick	2020 Elizabeth Street	Rotterdam	NY	12303
Curtis	Hakes	422 Sunnyside Road	Schoharie	NY	12157
Douglas	Hall	1072 Hegeman Street	Schenectady	NY	12306
Bruce	Hamelin	100 Hollister Way	Burnt Hills	NY	12027
David	Hansen	7 Smith Street	Gloversville	NY	12078
Wilfred	Harrington, III	25 Chatham Street	Nassau	NY	12123
Francis	Harris	18 Walden Glen	Ballston Lake	NY	12019
Eric	Harrison	106 Fort Road	Schoharie	NY	12157
Neil	Hart	345 Braman Corners Road	Esperance	NY	12066
Philip	Hartin	2870 Plunkett Avenue	Schenectady	NY	12306
John	Heaney	102 North Holmes Street	Scotia	NY	12302
Richard	Heisler	5 Earl Lynn Court	Cohoes	NY	12047
Paul	Hellijas	P.O. Box 81	Duanesburg	NY	12056
Keith	Henderson	543 Kautz Hollow Road	Johnsonville	NY	12094
Frederick	Herbst	121 Gordon Road	Schenectady	NY	12306
Robert	Hess	113 Elliot Avenue	Schenectady	NY	12304

Daniel	Hickok	133 Saratoga R L-11	Glenville	NY	12302
Kenneth	Hild	3049 Myrtle Avenue	Schenectady	NY	12306
John	Hildenbrandt	1902 Upper Gregg Road	Schenectady	NY	12306
Douglas	Hildreth	3499 State Route 145	Schoharie	NY	12157
Paul	Hill, Jr.	5 Orchard Terrace	Burnt Hills	NY	12027
Gary	Hillabrandt	19 High Land Terrace	Gloversville	NY	12078
Joseph	Hmura, III	6 Patroon Place	Ballston Lake	NY	12019
Donald	Hogan	90 Summerset Road	Stuyvesant	NY	12173
John	Holik	22 N. Second Avenue	Broadalbin	NY	12025
James	Holt	1831 Osterlitz Avenue	Schenectady	NY	12306
Wayne	Hotaling	1342 State Route 30A	Sloansville	NY	12160
Larry	Houck	195 Suto Road	Voorheesville	NY	12186
Floyd	Howard	149 Main Street, P.O. Box 152	Schenevus	NY	12155
Alfred	Iovinelli	75 Hillcrest Village, B1	Schenectady	NY	12309
Mark	Iwan	2226 Washout Road	Scotia	NY	12302
Shawn	Jablonski	183 Brookside Avenue	Amsterdam	NY	12010
Floyd	Jackson	406 Taurus Road	Schenectady	NY	12304
Kurt	Jackson	991 Van Vorst Road	Burnt Hills	NY	12027
Steven	Jambo	P.O.Box 259, 136 Mary Street	Tribes Hill	NY	12177
Roland	James	3242 Route 67 West	Fort Johnson	NY	12070
Joseph	Jankowski	P.O. Box 213	Rotterdam Junction	NY	12150
James	Jasewicz	244 Smith Road	Amsterdam	NY	12010
Gary	Jeannott	3229 Birchton Road	Ballston Spa	NY	12020
John	Jegabbi	1508 Washout Road	Scotia	NY	12302
Joseph	Jerome	348 Riverview Road	Rexford	NY	12148
Adam	Joachim	84 Blue Jay Way	Rexford	NY	12148
Walter	Johnston, Jr.	1214 Lark Street	Schenectady	NY	12306
Lawrence	Just	504 Bozenkill Road	Delanson	NY	12053
Thomas	Kaminski	134 Jones Road	Amsterdam	NY	12010
Francis	Karwowski	709 Bedford Road	Schenectady	NY	12308
John	Kearns	22 3rd Avenue	Broadalbin	NY	12025
Perry	Keels, Jr.	2705 5th Avenue	Troy	NY	12180
Paul	Kehoe	94 Minaville Street	Amsterdam	NY	12010
Brian	Kennedy	234-2 Ricjkard Hill	Schoharie	NY	12157
Elijah	Kennedy	P.O. Box 434	Schohane	NY	12157
Gary	Kennedy	105 DeWitt Avenue	Schenectady	NY	12304
John	Kennedy	631 County Highway 112	Gloversville	NY	12078
Robert	Kenyon	384 Hubb Shutts Road	Cobleskill	NY	12043
Craig	Kimball	4270 Queen Philomena Boulevard, Apt. 4	Schenectady	NY	12304
David	Kimball	9 Hall Road	Porter Corners	NY	12859
Glenn	Kinnie	22 Cartwheel Drive	Scotia	NY	12302
William	Kiuber	126 Hollywood Road	Amsterdam	NY	12010
George	Kline	6577 Skyline drive	Delanson	NY	12053
Daniel	Knightes	1002 Inner Drive	Schenectady	NY	12303
Thomas	Knightes	5 St. Anthony Lane	Scotia	NY	12302
Kevin	Koch	2321 Scotch Church Road	Pattersonville	NY	12137
Paul	Kondrat	2304 Route 67	Amsterdam	NY	12010
Francis	Konopka	2615 Barton Avenue	Schenectady	NY	12306
Damon	Korszun	49 Crestwood Drive	Schenectady	NY	12306
Thomas	Kronk	170 Walter Maxfield Road	Hadley	NY	12835

Larry	Kruger	1607 Main Street	Rotterdam Junction	NY	12150
Gregory	Krylowicz	7338 Western Turnpike	Delanson	NY	12053
Edmund	Krzysko	13 Gorski Street	Amsterdam	NY	12010
James	Kwak	5998 State Route 30	Schoharie	NY	12157
James	Lais	Box 116, 119 3rd Avenue	Tribes Hill	NY	12177
Kimball	Lake	314 Loudon Road, No. 84	Saratoga Sprngs	NY	12866
Paul	LaMalfa	8 Dartmouth Street	Schenectady	NY	12304
Raymond	Lang, Jr.	3020 Tibbits Avenue	Troy	NY	12180
Richard	Langdon	37 Fuller Terrace	Albany	NY	12205
Chris	Lanne	5 Homestead Road	Scotia	NY	12302
Michele	Lanoue	9 Perkins Street	Amsterdam	NY	12010
Kevin	Larson	218 Fonda Road	Waterford	NY	12188
James	Laugh	1905 West Fulton Road	Warnerville	NY	12187
Larry	Laurence	2311 Skyline Drive	Schenectady	NY	12306
David	Lawrence	3015 Lydius Street	Schenectady	NY	12303
Warren	LeBeau	639 Sacandaga Road	Scotia	NY	12302
Henry	Lenz	200 Birch Lane	Scotia	NY	12302
William	Lesniewski	402 County Highway 132	Hagaman	NY	12086
Daniel	Lewis	174 Wemple Road	Stephentown	NY	12168
James	Lewis	269 Pyramid River	Saratoga Springs	NY	12866
Kim	Lewis	36 Second Street	Pittsfield	MA	01201
Henry	Lionarons	296 Fitzdom Road	Pattersonville	NY	21237
William	Lobdell	1027 Keyserkill Road	Middleburgh	NY	12122
Andrew	Lojewski	135 Charlton Road	Ballston Spa	NY	12020
James	Lokenberg, Sr.	1544 Santa Fe Street	Schenectady	NY	12303
Robert	Lombardi	1667 Helderberg Avenue	Schenectady	NY	12306
Steven	Losert	258 Ruggles Road	Saratoga	NY	12866
Michael	Lotey	212 Woodman Road	Central Bridge	NY	12035
David	Lott	168 Spring Road	Scotia	NY	12302
Daniel	Loucks	187 Junction Road	Howes Cave	NY	12004
Johnny	Loucks	150 Yates Road	Mayfield	NY	12117
Al	Lover	3 Okara Drive, Apt. C-18	Schenectady	NY	12303
George	Lundstrom	1206 Ridge Road	Scotia	NY	12302
Edward	Lungen	151 Hill Road	Cobleskill	NY	12043
James	Lyons	1124 St. Jude Drive	Schenectady	NY	12303
Joseph	Macejka	32 Sherwood Lane	Burnt Hills	NY	12027
Robert	Macherone	37 Pine Street	Scotia	NY	12302
Brian	Maiello	193 Saratoga Avenue	Mechanicville	NY	12118
John	Maloney, Jr.	69 Flike Road	Stillwater	NY	12170
Edward	Malpass, Jr.	190 Verbeck Avenue	Schaghticoke	NY	12154
Paul	Manchester	514 Enders Avenue	Howes Cave	NY	12092
John	Mango	1085 Manas Drive	Schenectady	NY	12303
Gary	Markert	576 Brower Road	Palatine Bridge	NY	13428
Douglas	Martin	P.O. Box 296	Schoharie	NY	12157
Jerry	Martin	2434 Oakland Avenue	Schenectady	NY	12309
Michael	Martin	56 Cedar Lane	Scotia	NY	12302
Michael	Martin	29 Edgmont Court	Delmar	NY	12054
Casto	Martinez	Box 555	Schenectady	NY	12301
Linda	Martuscello	805 Holland Road	Schenectady	NY	12303
Paul	Mason	21 Amelia Drive	Schenectady	NY	12309

William	Matuszak	84 Bell Road	Altamont	NY	12009
Ralph	Maurello	390 Goode Street	Burnt Hills	NY	12027
Isabel	McCafferty	110 Maria Court	Schenectady	NY	12306
Scott	McCulloch	1 Fraiser Avenue	Johnstown	NY	12095
Howard	McDonald	49 Cuthbert Street	Scotia	NY	12302
Thomas	McGaffin	105 Hewitt Street	Amsterdam	NY	12010
Garry	McGrail	1164 Van Cortland Street	Schenectady	NY	12303
Daniel	McGreevy	166 5th Avenue	Troy	NY	12180
Rande	Mead	107 Hickory Ridge Road	Charlton	NY	12019
Richard	Mead	3450 Galway Road	Ballston Spa	NY	12020
Gary	Mell	3238 McDonald Avenue	Schenectady	NY	12304
James	Menge	237 Gray Road	Mayfield	NY	12117
John	Meola	1923 Balltown Road	Niskayuna	NY	12309
Bradley	Merrill	8244 State Route 3, P.O. Box 56	Vermontville	NY	12989
Gary	Mesec	1187 Hillside Avenue, Bldg. 5, Apt. A49	Niskayuna	NY	12309
Alfonso	Messineo	6 Grand Street	Amsterdam	NY	12010
George	Mickel	311 Pleasant Avenue	Johnstown	NY	12095
Thomas	Mickel	225 West Madison Avenue	Johnstown	NY	12095
Daniel	Miller, Sr.	55 Manor Court	Schenectady	NY	12306
Darlene	Miller	55 Manor Court	Schenectady	NY	12306
Herman	Miller	4 New Montgomery	Johnstown	NY	12095
Stuart	Minch	518 County Highway 110	Broadalbin	NY	12025
Jon	Moister	5 Mourning Kill Drive	Ballston Spa	NY	12020
John	Mongillo	6928 Amsterdam Road	Schenectady	NY	12302
Thomas	Moore	573 State Highway 29A	Gloversville	NY	12078
Joseph	Moraski	2368 Lower Gregg Road	Schenectady	NY	12306
John	Morhas	3389 Mariaville Road	Schenectady	NY	12306
Brian	Morris	11 Spartan Lane	Ballston Lake	NY	12019
George	Morris	3698 State Route 7	Howes Cave	NY	12092
Steven	Mosconi	3 Newman Street	Gloversville	NY	12078
Lawrence	Mudrey	2039 Rena Road	Castleton	NY	12033
Michael	Murphy	P.O. Box 388, 222 Washington Street	Northville	NY	12134
Gregory	Murray	133 Boqusky Court	Schenectady	NY	12306
Gordon	Murtagh	3329 Frank Street	Schenectady	NY	12306
Thomas	Myers	15 North Street	Delmar	NY	12054
Tadeusz	Naumowicz	342 W. Lucille Lane	Schenectady	NY	12306
John	Nelli	56 Union Street	Broadalbin	NY	12025
Robert	Newell	593 Mariaville Road	Schenectady	NY	12306
Russell	Newell, Jr.	3160 N. Thompson Street	Schenectady	NY	12306
James	Newton	111 Marriott Avenue	Schenectady	NY	12304
Edward	Neznek	32 Oak Lane	Gloversville	NY	12078
Robert	Nichols	6 Saint Anna Lane	Scotia	NY	12302
Michael	Nicosia	57 Fort Johnson Avenue	Fort Johnson	NY	12070
Richard	Norris, Sr.	1049 Forest Road	Schenectady	NY	12303
Clifford	Oathout	243 Lost Valley Road	Amsterdam	NY	12010
David	O'Brien	1056 Van Velsen Street	Schenectady	NY	12303
James	Olsen	2909 Caniston Road	Schenectady	NY	12304
Mark	Olson	P.O. Box 133	Mayfield	NY	12117
Gary	Ordon	533 Union Avenue	Schenectady	NY	12305
Paul	Osborne	225 Texacana Road	Ballston Spa	NY	12020

John	Paine	593 Muselbeck Road	Pattersonville	NY	12137
Mark	Palleschi	1665 Van Vranken Avenue	Schenectady	NY	12308
Peter	Palleschi	2136 Ferguson Street	Schenectady	NY	12307
Carmine	Pallotote	2142 Fairview Avenue	Schenectady	NY	12306
William	Palluti	396 County Highway 38A	Richmondville	NY	12149
Lucio	Palma	4 Augusta Court	Clifton Park	NY	12065
Gary	Palmo	1090 Shave Road	Schenectady	NY	12303
Nick	Palmucci	1504 Fordham Avenue	Schenectady	NY	12306
Edward	Paniccia	249 Zicha Road	Howes Cave	NY	12092
Ralph	Pasquariello	1736 Ulster Street	Schenectady	NY	12308
Michael	Pastracane	13 Long Meadow Drive	Mechanicville	NY	12118
Eugene	Patterson	24 Ashdown Road	Ballston Lake	NY	12019
Ron	Peacock	186 Ruggles Road	Saratoga	NY	12866
James	Pearman, II	6211 Johnston Road, Buckingham Apt. 1	Albany	NY	12203
Robert	Peeke	14 Grant Avenue	Amsterdam	NY	12010
Richard	Pelletier	508 Riverside Avenue	Scotia	NY	12302
William	Penman	525 Vischer Avenue	Schenectady	NY	12306
Giuseppe	Penna	100 Stratford Avenue	Pittsfield	MA	O1201
Ralph	Perreault	165 Spring Road	Delanson	NY	12053
Lawrence	Perrotti	P.O. Box 47	Sloansville	NY	12160
Timothy	Petit	877 Rock City Road	Ballston Spa	NY	12020
Raymond	Pfaffenbach	3283 Harold Street	Schenectady	NY	12306
Antony	Pharo	62 Margaret Drive	Ballston Spa	NY	12020
Carl	Pickett	4214 Jockey Street	Charlton	NY	12019
John	Pitucci	2 Dexter Street	Schenectady	NY	12309
Vincent	Pitucci	48 Old Fort Avenue	Schenectady	NY	12306
Adelebert	Pooler	4360 State Highway 30	Amsterdam	NY	12010
Robert	Poulin	955 Ridge Road	Broadalbin	NY	12025
Marilyn	Primett	43 Onderdonk Road	Schenectady	NY	12302
John	Proctor	3 Viewland Avenue	Schenectady	NY	12306
Richard	Pryor, Jr.	1166 Highland Park Road	Niskayuna	NY	12309
Louis	Puglisi	2597 Old Mill Road	Galway	NY	12074
John	Quackinbush	303 N. Perry Street	Johnstown	NY	12095
Michael	Quant	2346 Curry Road	Schenectady	NY	12303
Michael	Quill	403 Morrow Road	Amsterdam	NY	12010
Charles	Quinlivan	84 White Road	Ballston Spa	NY	12020
Jerry	Rabinoff	4042 Rynex Corners Road	Pattersonville	NY	12137
Anthony	Raimo	122 Central Avenue	Schenectady	NY	12304
Thomas	Rakoske	4 Belvedere Place	Clifton Park	NY	12065
Daniel	Rakvica	6 Wyndon Road	Ballston Lake	NY	12019
Richard	Ranyndo	2851 Caroline Avenue	Schenectady	NY	12306
John	Reek	3320 McDonald Avenue	Schenectady	NY	12305
John	Reese	4 Queens Drive, Apt. D3	Schenectady	NY	12304
Douglas	Regnier	132 Regnier Road	Amsterdam	NY	12010
Thomas	Reilly	41 Middle Avenue	Saratoga Springs	NY	12866
Floyd	Renzi	8 Deerleap Place	Saratoga Spnngs	NY	12866
Brad	Richardson	38 Frederick Street	Ballston Spa	NY	12020
James	Rightmyer	Box 82	Richmondville	NY	12149
John	Roberts	13 Veterans Drive	Fort Johnson	NY	12070
Douglas	Robinson	106 Della Valle Drive	Amsterdam	NY	12010

Roscoe	Robinson	140 Zicha Road	Howes Cave	NY	12092
Richard	Rocheleau	190 Steams Avenue	Pittsfield	MA	O1201
Ronald	Rodrigue	189 State Highway 55	Pattersonville	NY	12137
Alton	Roe	887 Depot Road	Duanesburg	NY	12056
Christopher	Roe	23 Walnut Street	Corinth	NY	12822
Clark	Roehr	97 Elliot Road	East Green Bush	NY	12061
James	Rollins	2033 Cardiff Road	Schenectady	NY	12303
Raymond	Ropitsky	3787 NY 67	Eagle Bndge	NY	12507
John	Roscioli	6862 Amsterdam Road	Scotia	NY	12302
John	Rossi	2043 Westside	Schenectady	NY	12306
Peter	Rossi	1634 Van Cortland Street	Schenectady	NY	12303
Richard	Rossi	216 Marcelis Avenue	Scotia	NY	12302
Walter	Rourke	729 Draper Avenue	Schenectady	NY	12306
Alfred	Rowback	121 Fremont Street	Gloversville	NY	12078
Arthur	Rozek	33 Pine Street	Scotia	NY	12302
Walter	Ruchalski	5 Birchwood Drive	Clifton Park	NY	12065
William	Rundell	204 Brandywine Parkway	Guiderland	NY	12084
Gordon	Ryan	710 Broadway	Mechanicville	NY	12118
Michael	Ryan	6 Rustic Bridge Road	Roxford	NY	12148
David	Saltsman	31 Albert Street	Amsterdam	NY	12010
Phillip	Santangelo, Jr.	5 Elmwood Avenue	Johnstown	NY	12095
Richard	Santspree	51 Main Street	Cohoes	NY	12047
Richard	Sargalis	484 Albany Bush Road	Johnstown	NY	12095
David	Saxby	479 Cedar Street	Schenectady	NY	12306
Robert	Schleicher	Box 214, 1 Johnson Road	Fultonville	NY	12072
Roger	Scott	2621 North Road	Middle Grove	NY	12850
William	Scoville	45 109th Street	Troy	NY	12182
James	Scranton	159 Fishback Road	Middle Grove	NY	12850
Gerald	Seaman	338 Old Ballston Avenue	Ballston Spa	NY	12020
Lawrence	Sebasta	8335 State Highway 30	Delanson	NY	12053
William	Sebasta	6 Roseland Court	Clifton Park	NY	12065
Israel	Seise	224 Grand Street	Amsterdam	NY	12010
Wayne	Senecal	46 West Main Street	North Adams	MA	O1247
Peter	Shafran	1422 Richard Street	Schenectady	NY	12303
Douglas	Shattuck	709 Charles Street	Scotia	NY	12302
Phillip	Shaver	47 Malta Avenue	Ballston Spa	NY	12020
John	Shepard, IV	134 Perry Boulevard	Fonda	NY	12068
John	Shoemaker	23 Oakland Avenue	Scotia	NY	12302
Ronald	Shrome	120 Diamond Point Road	Broadalbin	NY	12025
Ethelene	Simon	2234 5th Avenue	Troy	NY	12180
Martin	Simonds	P.O. Box 541	Fonda	NY	12068
Ronald	Sinatra	104 Northern Boulevard, No. 109	Hagaman	NY	12086
George	Sisson	124 Gordon Road	Fultonville	NY	12072
David	Skotarczak	32 Crane Street	Amsterdam	NY	12010
Larry	Skotarczak	1226 Trinity Avenue	Schenectady	NY	12306
Michael	Skotarczak	224 Vrooman Avenue	Amsterdam	NY	12010
Edward	Skowronek, Jr.	2021 Cardiff Road	Schenectady	NY	12303
Roger	Slater	P.O. Box 32	Carlisle	NY	12031
William	Smi	3403 Gari Lane	Schenectady	NY	12303
Brian	Smith	773 Sacandaga Road	Scotia	NY	12302

Eddie	Smith	180 6th Street	Scotia	NY	12302
Everett	Smith	36 Port Johnson Avenue	Fort Johnson	NY	12070
John	Smith	221 Cherry Street	Schenectady	NY	12306
Lewis	Smith	477 County Highway 110	Broadalbin	NY	12025
William	Smith	50 Continental Road	Schenectady	NY	12306
Stephen	Smolinsky	111 Droms Road	Scotia	NY	12302
Paul	Smyth	13 Ayre Drive	Albany	NY	12203
David	Snay	165 Treadlemire Road	Berne	NY	12023
Paul	Spiak	8 Mockingbird Lane	Fort Edward	NY	12828
Richard	Splawnik	632 State Highway 67	Amsterdam	NY	12010
Robert	Spraker	220 Reidel Road	Amsterdam	NY	12010
Alan	Squires	144 Steers Road	Amsterdam	NY	12010
Josh	Srantone	2142 Fairview Avenue	Schenectady	NY	12306
Charles	Sroboda	347 Northline Road	Ballston Spa	NY	12020
Laurin	Steele	100 Schermerhom Road	Rotterdam	NY	12306
Ronald	Stella	1182 County Highway 126	Amsterdam	NY	12010
James	Steward	1401 Donnsville Road	Schenectady	NY	12306
Larry	Strope	1005 Schuyler Avenue	Schenectady	NY	12306
Evelyn	Suarez	15 Romeyn Avenue	Amsterdam	NY	12010
Fletcher	Suchocki	155 Trout Lake Road	Richmondville	NY	12149
Gordon	Suits	361 Bogden Road	Broadalbin	NY	12025
Brian	Sullivan	9860 Duanesburg Road	Delanson	NY	12053
Stephen	Swartz	13192 Duanesburg Road	Delanson	NY	12053
Thomas	Sweet	429 South Shore Road	Edinburg	NY	12134
Michael	Symanski	313 Christine Lane	Schenectady	NY	12306
Robert	Syzdek	27 James Street	Amsterdam	NY	12010
Michael	Szwarnowicz	195 Northern Boulevard	Hagaman	NY	12086
Harland	Taylor	37 Nassau Avenue	Schenectady	NY	12304
James	Taylor	2230 Greenpoint Avenue	Schenectady	NY	12303
Richard	Taylor	297 Fayville Road	Galway	NY	12074
Jamie	Thompson	2232 Watt Street	Schenectady	NY	12304
David	Traver, Sr.	120 Hart Road	Amsterdam	NY	12010
John	Trolio	124 Elmer Avenue	Schenectady	NY	12308
Richard	Trombley	36 E. Harrison Street, Apt. 3	Saratoga Springs	NY	12866
Harvey	Trotter	309 Linden Street	Schenectady	NY	12304
Kenneth	Trotter	1024 Route 29, P.O. Box 43	Middle Falls	NY	12848
Joseph	Trumpler	218 Glen Avenue	Scotia	NY	12302
Kenneth	Trunko	19A Brookedge	Guilderland	NY	12084
Jeffrey	Tryon	167 Franzen Road	Richmondville	NY	12149
Harold	Tucker	221 Sherman Avenue	Troy	NY	12180
Richard	Turner	510 Log City Road	Amsterdam	NY	12010
Ronald	Twardzik	5899 State Highway 30	Amsterdam	NY	12010
Patrick	Unger	5 Pleasant Street	Gloversville	NY	12078
Stephen	Utter	P.O. Box 204	Schenevus	NY	12155
Edwin	Van Blarcom	322 Northline Road	Ballston Spa	NY	12020
Frank	Van Buren	239 West Shore Road	Delanson	NY	12053
Stuart	Van Husen	31 Beaver Street	Gloversville	NY	12078
Douglas	Van Nostrand	50 North Boulevard	Gloversville	NY	12078
Arthur	Van Vranken	22 Zani Lane	Ballston	NY	12019
Michael	Vassi	1194 County Highway	Fort Johnson	NY	12070

Richard	Vesely	3176 E. Lydius Street	Schenectady	NY	12303
John	Villani	17 Oriel Lane	Rensselaer	NY	12144
Kenneth	Wachowicz	69 South Shore Road	Northville	NY	12134
James	Walker	714 Kahn Road	Fort Plain	NY	13339
John	Wall	133 Princeton Street	Amsterdam	NY	12010
John	Wallace	2351 Pine Avenue	Schenectady	NY	12304
John	Walsh	199 Church Street	Fultonville	NY	12072
William	Walthers	90 Lorraine Avenue	Schenectady	NY	12304
Joseph	Ward	P.O. Box 512, 38 North Main Street	Mayfield	NY	12117
Kevin	Warner	P.O. Box 179, Kreutzer Road	Hinsdale	MA	1235
Michael	Warren	1326 Sunrise Boulevard	Schenectady	NY	12306
Mark	Waselauskas	993 County Highway 110	Broadalbin	NY	12025
William	Waters	9 Pheasant Run	Ballston Spa	NY	12020
Harold	Wells	3245 Martin Street	Schenectady	NY	12306
Robert	Wells	232 Jackson Valley Road	Amsterdam	NY	12010
Joseph	Whalen	13 Greenfield Avenue	Ballston Spa	NY	12020
Johnnie	Whitehead	1276 Princetown Road	Schenectady	NY	12306
Paul	Whitehead	395 Watervliet Shaker Road	Latham	NY	12110
John	Wicker	1133 Sacandaga Road	Scotia	NY	12302
Timothy	Wigley	439 Wilton Road	Greenfield Center	NY	12833
Michael	Wiley	103 Concord Avenue	Ballston Spa	NY	12020
Christopher	Williams	20 Massachusetts Avenue	Albany	NY	12205
Leroy	Williams, Jr.	231B Clinton Avenue	Albany	NY	12210
Gary	Wilson	211 N. Hoosac Road	Williamstown	MA	O1267
Roger	Wilson	1041 Roberts Hill Road	W. Coxsackie	NY	12192
William	Wilson	1 Tryon Avenue, Bldg. 22-1	Scotia	NY	12302
Eric	Wisensburn	#2 Frederick Street	Amsterdam	NY	12010
Robert	Wood	4 Lent Court, Apt. 23	Schenectady	NY	12306
Steven	Wozniak	104 14th Street	Schenectady	NY	12306
Rose	Wszolek	898 County Highway 138	Broadalbin	NY	12025
Hilliard	Wysomski, Jr	2757 Curry Road	Schenectady	NY	12303
Walter	Yanis	369 12th Street	Schenectady	NY	12306
John	Yerdon	1430 Corbin Hill Road	Sloansville	NY	12160
Gregory	Young	365 North Road	Amsterdam	NY	12010
John	Young	601 Mariaville Road	Schenectady	NY	12306
Stanley	Zelasko	5 Cloverdale Road	Wynantskill	NY	12198
Alban	Zeledon	474 Allen Road	Porter Comers	NY	12859
Frederick	Zerbst	P.O. Box 57	Dolgeville	NY	13329
Edward	Zero	10 Riverview Drive	Rotterdam	NY	12150
Gustav	Zuhlke	1118 Fort Hunter Road	Schenectady	NY	12303
Ken	Zykes	P.O. Box 13	Tribes Hill	NY	12177

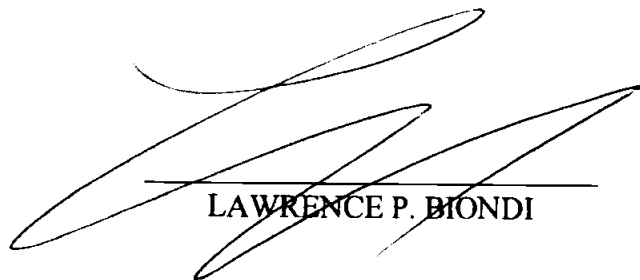
ATTORNEY'S VERIFICATION

STATE OF NEW YORK)
 : SS.:
COUNTY OF NEW YORK)

I, the undersigned, an attorney admitted to practice in the courts of New York State, state that I am the attorney of record for the Plaintiffs in the within action; I have read the foregoing COMPLAINT and know the contents thereof; the same is true to my own knowledge, except as to the matters therein stated to be alleged on information and belief, and as to those matters I believe it to be true. The reason this verification is made by me and not by Plaintiffs is because Plaintiffs do not reside within the county where I have my office. The grounds of my belief as to all matters not stated upon my own knowledge are based on conversations had with Plaintiffs and papers in the file.

I affirm that the foregoing statements are true, under the penalties of perjury.

Dated: White Plains, New York
December 14, 2005



LAWRENCE P. BIONDI

INDEX NO.: 116929/05

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

MICHAEL ABBATIELLO and SEE RIDER ATTACHED,

Plaintiffs,

-against-

MONSANTO COMPANY, SOLUTIA, INC. and
PHARMACIA CORPORATION,

Defendants.

AMENDED VERIFIED COMPLAINT

LAW OFFICES OF
LAWRENCE PERRY BIONDI

ATTORNEYS FOR PLAINTIFF(S)
81 MAIN STREET, SUITE 504
WHITE PLAINS, NEW YORK 10601
TELE .(914) 946-5093
FAX:(914) 946-7372